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Grosvenor Private Reserve Fund Limited,
Grosvenor Balanced Growth Fund Limited and
Grosvenor Aggressive Growth Fund Limited*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.
In re: BERNARD L. MADOFF Debtor.
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. GROSVENOR INVESTMENT MANAGEMENT LTD., GROSVENOR PRIVATE RESERVE FUND LIMITED (in liquidation), GROSVENOR BALANCED GROWTH FUND LIMITED (in liquidation) AND GROSVENOR AGGRESSIVE GROWTH FUND LIMITED (in liquidation),

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01021 (BRL)

Defendants.

**DECLARATION OF EHUD BARAK IN SUPPORT
OF DEFENDANTS' MOTION TO DISMISS THE COMPLAINT**

I, Ehud Barak, under penalty of perjury, declare:

1. I am a member of the bar of the State of New York and of this Court and a partner of Proskauer Rose LLP, counsel for the Grosvenor Defendants¹ in this adversary proceeding. I submit this declaration in support of the Grosvenor Defendants' motion to dismiss the Complaint (the "Complaint" or "Compl.," No. 12-01021 ECF No. 1) filed by plaintiff Irving H. Picard, Trustee (the "Trustee") for the Liquidation of Bernard L. Madoff Investment Securities LLC ("BLMIS") and the Estate of Bernard L. Madoff in this adversary proceeding.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Grosvenor Complaint, along with its exhibits (ECF No. 1).

3. Attached hereto as Exhibit 2 is a true and correct copy of the Trustee's Twenty Sixth Interim Report for the Period April 21, 2021 through September 30, 2021, Adv. Pro. No. 08-01789 (Bankr. S.D.N.Y. Oct. 29, 2021), ECF No. 20821, along with its exhibits.

4. Attached hereto as Exhibit 3 is a true and correct copy of the Amended Complaint filed in *Picard v. Fairfield Sentry Ltd., et al.*, Adv. Pro. No. 09-01239 (BRL) (the "Picard/Fairfield Action") (Bankr. S.D.N.Y. July 20, 2010), ECF No. 23 (the "Fairfield Amended Complaint").

5. Attached hereto as Exhibit 4 is a true and correct copy of the Second Amended Complaint filed in *Picard v. Fairfield Sentry Ltd., et al.*, Adv. Pro. No. 09-01239 (BRL) (Bankr. S.D.N.Y. Aug. 28, 2020), ECF No. 286 (the "Fairfield SAC").

6. Attached hereto as Exhibit 5 is a redline created by Proskauer using the

¹ The "Grosvenor Defendants" are, collectively: Grosvenor Aggressive Growth Fund Limited, Grosvenor Balanced Growth Fund Limited, Grosvenor Private Reserve Growth Fund Limited, and Grosvenor Investment Management Ltd.

Workshare Compare software between the Fairfield Amended Complaint and the Fairfield SAC.

7. Attached hereto as Exhibit 6 is a true and correct copy of the settlement agreement resolving the Picard/Fairfield Action, filed as ECF No. 69-2 in *Picard v. Fairfield Sentry Fund Ltd.*, Adv. Pro. 09-01239 (Bankr. S.D.N.Y. May 9, 2011) (the “Fairfield Settlement Agreement”).

8. Attached hereto as Exhibit 7 is a true and correct copy of the ruling of the United Kingdom Judicial Committee of the Privy Council in the case of *Fairfield Sentry Ltd. (In Liquidation) v. Migani*, [2014] UKPC 9, which Proskauer downloaded from the Privy Council’s website at: <https://www.jcpc.uk/cases/docs/jcpc-2012-0061-judgment.pdf> (last accessed Mar. 22, 2022).

9. Attached hereto as Exhibit 8 is a true and correct copy of the cover page, index, and excerpts from exhibits 8, 9, 16, and 17 to the Fairfield Amended Complaint filed in *Picard v. Fairfield Sentry Ltd.*, Adv. Pro. 09-01239 (Bankr. S.D.N.Y. May July 20, 2010) Dkt. No 23-1, which is incorporated into the Complaint against Grosvenor (Compl. ¶ 38). These exhibits are identified in the index as redemption confirmations for withdrawals from Sentry made by Fairfield Sigma Limited, Fairfield Lambda Limited, and Fairfield Investment Trust. The Trustee did not file these exhibits on the Court’s ECF system, but instead filed (as 09-01239 ECF 23-1) an index to the exhibits together with a slip sheet stating that the exhibits are available upon request to the Trustee’s counsel Baker & Hostetler LLP. Proskauer obtained them from the Trustee’s counsel as directed in the Trustee’s filing.

10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from exhibits 5, 6, 8, 10, 12, 13, 14, and 21 to the Fairfield SAC filed in *Picard v. Fairfield Sentry Ltd.*, Adv. Pro. 09-01239 (Bankr. S.D.N.Y. May 9, 2011) Dkt. Nos. 286-5, 286-6, 286-8, 286-10, 286-12, 286-

13, 286-14, 286-21.²

11. Exhibit 10 is a true and correct copy of excerpts from complaints and/or exhibits filed by the Trustee in the following adversary proceedings in this case (each excerpt is referred to below from each adversary proceeding in the format “[Adv. Proc. No.] ECF [Dkt. No.]” The captioned defendant in each adversary proceeding, along with the defined title of the specific party identified in the excerpt, is also provided, as well as a pin cite to the excerpt’s location in the exhibit):

Filing	Captioned Defendant (“Defined Title(s)”)	Ex., Page
10-05345 ECF 1-1 [p. 52]	<i>Citibank N.A. et al.</i>	10(a), at 1
10-05346 ECF 1-1 [p. 43]	<i>Merrill Lynch International</i>	10(b), at 4
10-05348 ECF 42-4	<i>Nomura International PLC</i>	10(c), at 7
10-05351 ECF 1-1 [p. 44]	<i>Banco Bilbao Vizcaya Argentaria, S.A.</i>	10(d), at 9
11-01724 ECF 1 [p. 24]	<i>Pictet et Cie.</i>	10(e), at 12
11-01885 ECF 1-3	<i>Safra National Bank of New York</i> (“Safra New York”)	10(f), at 15
11-02149 ECF 1-11	<i>Banque SYZ & Co., S.A.</i>	10(g), at 20
11-02493 ECF 1-5	<i>Abu Dhabi Investment Authority</i> (“ADIA”)	10(h), at 22
11-02537 ECF 1-3	<i>Orbita Capital Return Strategy Limited</i> (“Orbita”)	10(i), at 24
11-02538 ECF 1-4	<i>Quilvest Finance Ltd.</i> (“Quilvest”)	10(j), at 26
11-02539 ECF 1-3	<i>Meritz Fire & Marine Insurance Co. Ltd.</i>	10(k), at 28
11-02540 ECF 1-4	<i>Lion Global Investors Limited</i> (“LGI”)	10(l), at 30
11-02541 ECF 1-4	<i>First Gulf Bank</i>	10(m), at 32
11-02542 ECF 1-3	<i>Parson Finance Panama S.A.</i>	10(n), at 34
11-02551 ECF 1-4	<i>Delta National Bank and Trust Company</i> (“Delta Bank”)	10(o), at 36
11-02553 ECF 1-3	<i>Unifortune Asset Management SGR SPA et. ano.</i> (“Unifortune”)	10(p), at 39
11-02554 ECF 1-4	<i>National Bank of Kuwait S.A.K.</i>	10(q), at 41
11-02568 ECF 1-4	<i>Cathay Life Insurance Co. Ltd.</i> (“Cathay Insurance”)	10(r), at 43
11-02568 ECF 1-5	<i>Cathay Life Insurance Co. Ltd.</i> (“Cathay Bank”)	10(s), at 45
11-02569 ECF 1-4	<i>Barclays Bank (Suisse) S.A. et al.</i> (“Barclays Spain”)	10(t), at 47
11-02569 ECF 1-7	<i>Barclays Bank (Suisse) S.A. et al.</i> (“Barclays Suisse”)	10(u), at 49
11-02569 ECF 1-9	<i>Barclays Bank (Suisse) S.A. et al.</i> (“Barclays Private Bank”)	10(v), at 52
11-02570 ECF 1-3	<i>Banca Carige S.P.A.</i>	10(w), at 54
11-02571 ECF 1-4	<i>Banque Privee Espirito Santo S.A. formerly known as</i> <i>Compagnie Bancaire Espirito Santo S.A.</i> (“BPES”)	10(x), at 56
11-02572 ECF 1-3	<i>Korea Exchange Bank, Individually and as Trustee for Korea</i> <i>Global All Asset Trust</i> (“KEB”)	10(y), at 59
11-02573 ECF 8-4	<i>The Sumitomo Trust and Banking Co., Ltd.</i>	10(z), at 61

² It should be noted that both Exhibits 8 and 9 of ECF 23-1, and Exhibits 286-5 and 286-6 identify transfers to the same parties: Fairfield Sigma and Fairfield Lambda. Exhibits 8 and 9 of ECF 23-1 are used in this analysis only to identify transfers made before September 18, 2003, which are not covered by Exhibits 286-5 and 286-6. Exhibits 285-5 and 286-6 are used to calculate all transfers on and after September 18, 2003.

Filing	<i>Captioned Defendant</i> (“Defined Title(s)”)	Ex., Page
11-02730 ECF 1-4	<i>ASB Bank Corp.</i> (“ASB”)	10(aa), at 63
11-02731 ECF 1-3	<i>Trincaster Corporation</i>	10(bb), at 65
11-02732 ECF 1-3	<i>Bureau of Labor Insurance</i>	10(cc), at 67
11-02733 ECF 1-3	<i>Naidot & Co.</i> (“Naidot”)	10(dd), at 69
11-02758 ECF 1-4	<i>Caceis Bank, Caceis Bank Luxembourg</i>	10(ee), at 71
11-02760 ECF 1-3	<i>ABN AMRO Bank N.V. (now known as The Royal Bank of Scotland, N.V.)</i> (“ABN Switzerland”)	10(ff), at 73
11-02762 ECF 1-4	<i>Lighthouse Investment Partners LLC, doing business as Lighthouse Partners</i> (“Lighthouse Diversified”)	10(gg), at 75
11-02762 ECF 1-5	<i>Lighthouse Investment Partners LLC, doing business as Lighthouse Partners</i> (“Lighthouse Supercash”)	10(hh), at 77
11-02763 ECF 1-4	<i>Inteligo Bank LTD. Panama Branch, formerly known as Blubank LTD. Panama Branch</i> (“Inteligo”)	10(ii), at 79
11-02784 ECF 1-3	<i>Somers Dublin Limited et al.</i> (“Somers Dublin”)	10(jj), at 81
11-02910 ECF 1-3	<i>Merrill Lynch Bank (Suisse)</i> (“MLBS”)	10(kk), at 83
11-02922 ECF 1-3	<i>Bank Julius Baer & Co. Ltd.</i> (“BJB”)	10(ll), at 86
11-02923 ECF 1-3	<i>Falcon Private Bank Ltd. (formerly known as AIG Privat Bank AG)</i> (“Falcon”)	10(mm), at 89
11-02925 ECF 1-5	<i>Credit Suisse AG et al.</i> (“CS Sentry Transferees: Credit Suisse AG; Credit Suisse AG, Nassau Branch; Credit Suisse London Nominees; Credit Suisse (Luxembourg); Credit Suisse, Nassau Branch LATAM Investment Banking; Credit Suisse Nominees (Guernsey); Credit Suisse Wealth Management”)	10(nn), at 91
11-02929 ECF 1-3	<i>LGT Bank in Liechtenstein</i> (“LGT Liechtenstein”)	10(oo), at 96
12-01002 ECF 1-3	<i>The Public Institution for Social Security</i> (“PIFSS”)	10(pp), at 98
12-01004 ECF 1-3	<i>Fullerton Capital PTE Ltd.</i> (“Fullerton”)	10(qq), at 100
12-01005 ECF 1-6	<i>SICO Limited</i> (“SICO”)	10(rr), at 102
12-01019 ECF 1-6	<i>Banco Itau Europa Luxembourg S.A. et ano.</i> (“Banco Itau”)	10(ss), at 104
12-01019 ECF 1-7	<i>Banco Itau Europa Luxembourg S.A. et ano.</i> (“Banco Itau International”)	10(tt), at 109
12-01022 ECF 1-10	<i>Credit Agricole (Suisse) et al.</i> (“Credit Agricole Suisse”)	10(uu), at 112
12-01023 ECF 1-3	<i>Arden Asset Management Inc. et al.</i> (“Arden Management”)	10(vv), at 115
12-01046 ECF 1-3	<i>SNS Bank N.V. et ano.</i> (“SNS Defendants”)	10(ww), at 117
12-01047 ECF 1-3	<i>Koch Industries, Inc., as successor in interest to Koch Investment (UK) Company</i> (“Koch Investment”)	10(xx), at 120
12-01048 ECF 1-3	<i>Banco General S.A. et ano.</i> (“BG Valores”)	10(yy), at 122
12-01194 ECF 1-3	<i>Kookmin Bank</i>	10(zz), at 124
12-01195 ECF 1-3	<i>Six Sis AG</i>	10(aaa), at 126
12-01202 ECF 1-9	<i>Bank Vontobel AG formerly known as Bank J. Vontobel & Co. AG</i> (“Bank Vontobel”)	10(bbb), at 128
12-01205 ECF 1-6	<i>Multi-Strategy Fund Limited et ano.</i> (“Multi-Strategy Fund”)	10(ccc), at 130
12-01207 ECF 1-3	<i>Lloyds TSB Bank PLC</i> (“Lloyds”)	10(ddd), at 132
12-01209 ECF 1-3	<i>BSI AG, individually and as successor in interest to Banco Del</i>	10(eee), at 134

Filing	<i>Captioned Defendant</i> (“Defined Title(s)”)	Ex., Page
	<i>Gottardo</i> (“BSI”)	
12-01209 ECF 1-4	<i>BSI AG, individually and as successor in interest to Banco Del Gottardo</i> (“Banca Del Gottardo”)	10(fff), at 138
12-01210 ECF 1-14	<i>Schroder & Co. Bank AG</i>	10(ggg), at 141
12-01211 ECF 1-3	<i>Union Securities Investment Trust Co., Ltd. et al.</i> (“Union Global Fund”)	10(hhh), at 143
12-01211 ECF 1-4	<i>Union Securities Investment Trust Co., Ltd. et al.</i> (“Union Global A Fund”)	10(iii), at 145
12-01211 ECF 1-5	<i>Union Securities Investment Trust Co., Ltd. et al.</i> (“Union Strategy Fund”)	10(jjj), at 147
12-01216 ECF 1-6	<i>Bank Hapoalim (Switzerland) Ltd. et al.</i> (“Hapoalim Switzerland”)	10(kkk), at 149
12-01216 ECF 1-7	<i>Bank Hapoalim (Switzerland) Ltd. et al.</i> (“Hapoalim B.M.”)	10(lll), at 151
12-01512 ECF 1-6	<i>ZCM Asset Holding Company (Bermuda) LLC</i> (“ZCM”)	10(mmm), at 153
12-01513 ECF 1-3	<i>Citivic Nominees Ltd.</i> (“Citivic”)	10(nnn), at 155
12-01565 ECF 1-6	<i>Standard Chartered Defendants</i>	10(ooo), at 157
12-01566 ECF 1-2	<i>UKFP (Asia) Nominees Limited</i> (“UKFP”)	10(ppp), at 162
12-01576 ECF 1-3	<i>BNP Paribas S.A.</i> (“BNP Paribas”)	10(qqq), at 164
12-01577 ECF 1-3	<i>UBS Deutschland AG as successor in interest to Dresdner Bank LateinAmerika AG et ano.</i> (“UBS Deutschland”)	10(rrr), at 166
12-01577 ECF 1-4	<i>UBS Deutschland AG as successor in interest to Dresdner Bank LateinAmerika AG et ano.</i> (“LGT Switzerland”)	10(sss), at 168
12-01669 ECF 1-9	<i>Barfield Nominees Limited</i> (“Barfield Defendants”)	10(ttt), at 170
12-01670 ECF 1-9	<i>Credit Agricole Corporate and Investment Bank doing business as Credit Agricole Private Banking Miami, formerly known as Calyon S.A. doing business as Credit Agricole Miami Private Bank, Successor in Interest to Credit Lyonnais S.A.</i> (“BBH”)	10(uuu), at 172
12-01670 ECF 1-10	<i>Credit Agricole Corporate and Investment Bank doing business as Credit Agricole Private Banking Miami, formerly known as Calyon S.A. doing business as Credit Agricole Miami Private Bank, Successor in Interest to Credit Lyonnais S.A.</i> (“Credit Agricole Miami”)	10(vvv), at 175
12-01676 ECF 1-5	<i>Credit Suisse AG, as successor in interest to Clariden Leu AG and Bank Leu AG</i> (“Clariden; Bank Leu”)	10(www), at 177
12-01677 ECF 1-5	<i>Societe Generale Private Banking (Suisse) S.A. formerly known as SG Private Banking Suisse S.A. et al.</i> (“SG Sentry Defendants: Lyxor Premium; SG Audace; SG Equilibrium; SG Premium; SG Suisse, SG UK”)	10(xxx), at 181
12-01680 ECF 1-3	<i>Intesa Sanpaolo SpA (as Successor in Interest to Banca Intesa SpA) et al.</i> (“Low Volatility”)	10(yyy), at 184
12-01680 ECF 1-4	<i>Intesa Sanpaolo SpA (as Successor in Interest to Banca Intesa SpA) et al.</i> (“Medium Volatility”)	10(zzz), at 186
12-01690 ECF 1-7	<i>EFG Bank S.A., formerly known as EFG Private Bank S.A. et al.</i> (“EFG Bank”)	10(aaaa), at 188
12-01691 ECF 1-3	<i>Banque Degroof SA/NV also known as Banque Degroof Bruxelles et al.</i> (“Degroof”)	10(bbbb), at 195
12-01691 ECF 1-4	<i>Banque Degroof SA/NV also known as Banque Degroof</i>	10(cccc), at 197

Filing	Captioned Defendant (“Defined Title(s)”)	Ex., Page
	<i>Bruxelles et al.</i> (“BD Lux”)	
12-01693 ECF 1-3	<i>Banque Lombard Odier & Cie SA</i> (“Lombard Odier”)	10(dddd), at 199
12-01694 ECF 1-3	<i>Banque Cantonale Vaudoise</i> (“BCV”)	10(eeee), at 203
12-01695 ECF 1-3	<i>Bordier & Cie</i> (“Bordier”)	10(ffff), at 205
12-01697 ECF 1-3	<i>ABN AMRO Fund Services (Isle of Man) Nominees Limited, formerly known as Fortis (Isle Of Man) Nominees Limited et al.</i> (“ABN AMRO Defendants”)	10(gggg), at 207
12-01698 ECF 1-5	<i>Banque Internationale a Luxembourg S.A. (formerly known as Dexia Banque Internationale a Luxembourg S.A.), individually and as successor in interest to Dexia Nordic Private Bank S.A. et al.</i> (“Dexia Fairfield Sentry Defendants: Dexia Banque; Dexia Banque Suisse”)	10(hhhh), at 209
12-01699 ECF 1-5	<i>Royal Bank of Canada et al.</i> (“RBC Fairfield Sentry Defendants: Guernroy or RBC-CI; RBC; RBC-Dominion; RBC-Jersey; RBC-Suisse”)	10(iiii), at 211

12. Attached hereto as Exhibit 11 is a true and correct copy of the Trustee’s Proffered Allegations Pertaining to the Extraterritoriality Issue as to Grosvenor Defendants (ECF No. 70) (“Proffer”).

13. Attached hereto as Exhibit 12 is a true and correct copy of the First Amended Complaint filed in *Fairfield Sentry Ltd. v. Citco Global Custody NV*, Adv. Pro. No. 19-01122 (Bankr. S.D.N.Y. Nov. 26, 2019), ECF No. 19.

14. According to the Trustee’s allegations contained in Exhibit B of the Grosvenor Complaint, as well as Exhibits 8, 9 and 10 hereto, BLMIS and Sentry made the following transfers:

- a. On May 9, 2003, BLMIS transferred \$40 million to Sentry (Compl. Ex. B at 19). That is the earliest initial transfer alleged by the Trustee after the six-year statute of limitations cutoff date (December 11, 2002), and thus the earliest transferred customer property that could even potentially be recovered by the Trustee.
- b. From May 14, 2003 to May 20, 2003, Sentry paid out \$51.7 million, \$11.7 million more than BLMIS transferred on May 9, 2003, thus more than exhausting the funds received

from BLMIS:

Date	Recipient	Amount	Source	Ex., Page
5/14/2003	Fairfield Sigma	(\$1,800,000)	09-01239 ECF 23-1 Ex. 8	8, at 8
5/14/2003	Fairfield Lambda	(1,100,000)	09-01239 ECF 23-1 Ex. 9	8, at 14
5/14/2003	Fairfield Investment Fund	(3,200,000)	09-01239 ECF 286-10	9, at 7
5/14/2003	Fairfield Investment Fund	(6,525,000)	09-01239 ECF 286-10	9, at 7
5/14/2003	Fairfield Investment Trust	(2,110,788)	09-01239 ECF 23-1 Ex. 17	8, at 25
5/14/2003	Quilvest	(168,554)	11-02538 ECF 1-4	10(j), at 27
5/14/2003	Quilvest	(210,313)	11-02538 ECF 1-4	10(j), at 27
5/14/2003	Quilvest	(311,518)	11-02538 ECF 1-4	10(j), at 27
5/14/2003	Delta Bank	(73,217)	11-02551 ECF 1-4	10(o), at 37
5/14/2003	Delta Bank	(100,952)	11-02551 ECF 1-4	10(o), at 37
5/14/2003	Delta Bank	(111,651)	11-02551 ECF 1-4	10(o), at 37
5/14/2003	Delta Bank	(696,496)	11-02551 ECF 1-4	10(o), at 37
5/14/2003	MLBS	(504,029)	11-02910 ECF 1-3	10(kk), at 84
5/14/2003	MLBS	(1,500,000)	11-02910 ECF 1-3	10(kk), at 84
5/14/2003	MLBS	(2,498,558)	11-02910 ECF 1-3	10(kk), at 84
5/14/2003	BJB	(1,954,536)	11-02922 ECF 1-3	10(ll), at 87
5/14/2003	Credit Suisse London Nominees	(36,000)	11-02925 ECF 1-5	10(nn), at 92
5/14/2003	Credit Suisse Nominees (Guernsey)	(401,103)	11-02925 ECF 1-5	10(nn), at 92
5/14/2003	Credit Suisse London Nominees	(2,159,026)	11-02925 ECF 1-5	10(nn), at 92
5/14/2003	LGT Liechtenstein	(500,974)	11-02929 ECF 1-3	10(oo), at 97
5/14/2003	SNS Defendants	(641,531)	12-01046 ECF 1-3	10(ww), at 118
5/14/2003	Lloyds	(247,494)	12-01207 ECF 1-3	10(ddd), at 133
5/14/2003	Lloyds	(2,093,660)	12-01207 ECF 1-3	10(ddd), at 133
5/14/2003	BSI	(191,989)	12-01209 ECF 1-3	10(eee), at 135
5/14/2003	BSI	(238,192)	12-01209 ECF 1-3	10(eee), at 135
5/14/2003	BSI	(266,369)	12-01209 ECF 1-3	10(eee), at

Date	Recipient	Amount	Source	Ex., Page
				135
5/14/2003	BSI	(621,629)	12-01209 ECF 1-3	10(eee), at 135
5/14/2003	Banca Del Gottardo	(270,407)	12-01209 ECF 1-4	10(fff), at 139
5/14/2003	Banca Del Gottardo	(1,401,608)	12-01209 ECF 1-4	10(fff), at 139
5/14/2003	ZCM	(360,000)	12-01512 ECF 1-6	10(mmm), at 154
5/14/2003	Citivic	(103,656)	12-01513 ECF 1-3	10(nnn), at 156
5/14/2003	UKFP	(125,144)	12-01566 ECF 1-2	10(ppp), at 163
5/14/2003	Clariden	(84,331)	12-01676 ECF 1-5	10(www), at 178
5/14/2003	EFG Bank	(72,108)	12-01690 ECF 1-7	10(aaaa), at 189
5/14/2003	EFG Bank	(170,077)	12-01690 ECF 1-7	10(aaaa), at 189
5/14/2003	EFG Bank	(207,312)	12-01690 ECF 1-7	10(aaaa), at 189
5/14/2003	EFG Bank	(279,420)	12-01690 ECF 1-7	10(aaaa), at 189
5/14/2003	EFG Bank	(285,234)	12-01690 ECF 1-7	10(aaaa), at 189
5/14/2003	EFG Bank	(5,803,800)	12-01690 ECF 1-7	10(aaaa), at 189
5/14/2003	EFG Bank	(10,440,439)	12-01690 ECF 1-7	10(aaaa), at 189
5/14/2003	Lombard Odier	(135,203)	12-01693 ECF 1-3	10(dddd), at 200
5/14/2003	Lombard Odier	(345,219)	12-01693 ECF 1-3	10(dddd), at 200
5/19/2003	ZCM	(1,300,000)	12-01512 ECF 1-6	10(mmm), at 154
5/20/2003	Credit Suisse, Nassau Branch LATAM Investment Banking	(93,029)	11-02925 ECF 1-5	10(nn), at 92
Total		(\$51,740,566)		

c. From June 16 through June 18, 2003, Sentry transferred approximately an additional \$10.5 million in redemptions:

Date	Recipient	Amount	Source	Ex., Page
6/16/2003	Fairfield Investment Trust	(\$50,000)	09-01239 ECF 23-1 Ex. 16	8, at 20
6/16/2003	Naidot	(1,000,000)	11-02733 ECF 1-3	10(dd), at 70

Date	Recipient	Amount	Source	Ex., Page
6/16/2003	MLBS	(25,000)	11-02910 ECF 1-3	10(kk), at 84
6/16/2003	BJB	(300,287)	11-02922 ECF 1-3	10(ll), at 87
6/16/2003	Credit Suisse London Nominees	(20,000)	11-02925 ECF 1-5	10(nn), at 92
6/16/2003	Credit Suisse London Nominees	(20,802)	11-02925 ECF 1-5	10(nn), at 92
6/16/2003	Credit Suisse AG, Nassau Branch	(71,259)	11-02925 ECF 1-5	10(nn), at 92
6/16/2003	Credit Suisse London Nominees	(100,000)	11-02925 ECF 1-5	10(nn), at 92
6/16/2003	LGT Liechtenstein	(72,797)	11-02929 ECF 1-3	10(oo), at 97
6/16/2003	SNS Defendants	(170,654)	12-01046 ECF 1-3	10(ww), at 118
6/16/2003	Bank Vontobel	(227,490)	12-01202 ECF 1-9	10(bbb), at 129
6/16/2003	BSI	(113,745)	12-01209 ECF 1-3	10(eee), at 135
6/16/2003	BSI	(180,190)	12-01209 ECF 1-3	10(eee), at 135
6/16/2003	BSI	(255,335)	12-01209 ECF 1-3	10(eee), at 135
6/16/2003	ZCM	(170,000)	12-01512 ECF 1-6	10(mmm), at 154
6/16/2003	Citivic	(496,838)	12-01513 ECF 1-3	10(nnn), at 156
6/16/2003	UKFP	(46,180)	12-01566 ECF 1-2	10(ppp), at 163
6/16/2003	UKFP	(199,763)	12-01566 ECF 1-2	10(ppp), at 163
6/16/2003	Bank Leu	(51,868)	12-01676 ECF 1-5	10(www), at 178
6/16/2003	Low Volatility	(1,000,000)	12-01680 ECF 1-3	10(yyy), at 185
6/16/2003	EFG Bank	(38,983)	12-01690 ECF 1-7	10(aaaa), at 189
6/16/2003	EFG Bank	(42,859)	12-01690 ECF 1-7	10(aaaa), at 189
6/16/2003	EFG Bank	(82,688)	12-01690 ECF 1-7	10(aaaa), at 189
6/16/2003	EFG Bank	(90,996)	12-01690 ECF 1-7	10(aaaa), at 189
6/16/2003	EFG Bank	(120,169)	12-01690 ECF 1-7	10(aaaa), at 189
6/16/2003	EFG Bank	(133,882)	12-01690 ECF 1-7	10(aaaa), at 189

Date	Recipient	Amount	Source	Ex., Page
6/16/2003	EFG Bank	(382,274)	12-01690 ECF 1-7	10(aaaa), at 189
6/16/2003	EFG Bank	(505,273)	12-01690 ECF 1-7	10(aaaa), at 189
6/16/2003	EFG Bank	(655,000)	12-01690 ECF 1-7	10(aaaa), at 189
6/16/2003	EFG Bank	(1,968,406)	12-01690 ECF 1-7	10(aaaa), at 189
6/16/2003	Bordier	(1,144,165)	12-01695 ECF 1-3	10(ffff), at 206
6/18/2003	ZCM	(750,000)	12-01512 ECF 1-6	10(mmm), at 154
Total		(\$10,486,903)		

d. On July 11, 2003, BLMIS transferred \$55 million to Sentry (Compl. Ex. B at 20).

e. On July 16, 2003, Sentry paid out \$81 million, \$26.8 million more than the July 11, 2003

transfer from BLMIS, thus once again exhausting the funds received from BLMIS:

Date	Recipient	Amount	Source	Ex., Page
7/16/2003	Fairfield Sigma	(\$3,000,000)	09-01239 ECF 23-1 Ex. 8	8, at 9
7/16/2003	Fairfield Lambda	(250,000)	09-01239 ECF 23-1 Ex. 9	8, at 15
7/16/2003	Fairfield Investment Trust	(200,000)	09-01239 ECF 23-1 Ex. 17	8, at 26
7/16/2003	Quilvest	(54,186)	11-02538 ECF 1-4	10(j), at 27
7/16/2003	Quilvest	(2,471,566)	11-02538 ECF 1-4	10(j), at 27
7/16/2003	Delta Bank	(404,373)	11-02551 ECF 1-4	10(o), at 37
7/16/2003	Delta Bank	(2,493,614)	11-02551 ECF 1-4	10(o), at 37
7/16/2003	Inteligo	(2,336,175)	11-02763 ECF 1-4	10(ii), at 80
7/16/2003	MLBS	(1,529,000)	11-02910 ECF 1-3	10(kk), at 84
7/16/2003	BJB	(610,990)	11-02922 ECF 1-3	10(ll), at 87
7/16/2003	Credit Suisse Nominees (Guernsey)	(693,868)	11-02925 ECF 1-5	10(nn), at 92
7/16/2003	Credit Suisse London Nominees	(788,344)	11-02925 ECF 1-5	10(nn), at 92
7/16/2003	Credit Suisse London Nominees	(1,684,206)	11-02925 ECF 1-5	10(nn), at 92
7/16/2003	SICO	(73,522)	12-01005 ECF 1-6	10(rr), at 103
7/16/2003	SICO	(77,189)	12-01005 ECF 1-6	10(rr), at 103

Date	Recipient	Amount	Source	Ex., Page
7/16/2003	SICO	(82,428)	12-01005 ECF 1-6	10(rr), at 103
7/16/2003	SNS Defendants	(2,215,212)	12-01046 ECF 1-3	10(ww), at 118
7/16/2003	Lloyds	(336,843)	12-01207 ECF 1-3	10(ddd), at 133
7/16/2003	BSI	(119,134)	12-01209 ECF 1-3	10(eee), at 135
7/16/2003	BSI	(148,763)	12-01209 ECF 1-3	10(eee), at 135
7/16/2003	BSI	(260,940)	12-01209 ECF 1-3	10(eee), at 135
7/16/2003	UKFP	(35,153)	12-01566 ECF 1-2	10(ppp), at 163
7/16/2003	UKFP	(47,293)	12-01566 ECF 1-2	10(ppp), at 163
7/16/2003	UKFP	(56,787)	12-01566 ECF 1-2	10(ppp), at 163
7/16/2003	UKFP	(74,625)	12-01566 ECF 1-2	10(ppp), at 163
7/16/2003	UKFP	(76,224)	12-01566 ECF 1-2	10(ppp), at 163
7/16/2003	UKFP	(100,735)	12-01566 ECF 1-2	10(ppp), at 163
7/16/2003	UKFP	(167,640)	12-01566 ECF 1-2	10(ppp), at 163
7/16/2003	UKFP	(302,756)	12-01566 ECF 1-2	10(ppp), at 163
7/16/2003	SG Premium	(973,253)	12-01677 ECF 1-5	10(xxx), at 182
7/16/2003	SG Audace	(1,223,229)	12-01677 ECF 1-5	10(xxx), at 182
7/16/2003	Lyxor Premium	(8,580,866)	12-01677 ECF 1-5	10(xxx), at 182
7/16/2003	SG Equilibrium	(32,270,698)	12-01677 ECF 1-5	10(xxx), at 182
7/16/2003	EFG Bank	(35,024)	12-01690 ECF 1-7	10(aaaa), at 189
7/16/2003	EFG Bank	(51,015)	12-01690 ECF 1-7	10(aaaa), at 189
7/16/2003	EFG Bank	(238,240)	12-01690 ECF 1-7	10(aaaa), at 189
7/16/2003	EFG Bank	(266,886)	12-01690 ECF 1-7	10(aaaa), at 189
7/16/2003	EFG Bank	(476,480)	12-01690 ECF 1-7	10(aaaa), at 189
7/16/2003	EFG Bank	(476,480)	12-01690 ECF 1-7	10(aaaa), at 189

Date	Recipient	Amount	Source	Ex., Page
7/16/2003	EFG Bank	(1,447,307)	12-01690 ECF 1-7	10(aaaa), at 189
7/16/2003	EFG Bank	(1,594,867)	12-01690 ECF 1-7	10(aaaa), at 189
7/16/2003	Lombard Odier	(5,615,477)	12-01693 ECF 1-3	10(dddd), at 200
7/16/2003	Lombard Odier	(6,027,000)	12-01693 ECF 1-3	10(dddd), at 200
7/16/2003	Bordier	(1,497,385)	12-01695 ECF 1-3	10(ffff), at 206
7/16/2003	RBC-Dominion	(367,180)	12-01699 ECF 1-5	10(iiii), at 212
Total		(\$81,832,953)		

f. On July 22, 2003, BLMIS transferred \$25 million to Sentry (Compl. Ex. B at 20.).

According to the Complaint, this is the last transfer of BLMIS funds into Sentry until 2005 (Compl. Ex. B 20-23, 51-54, 66, 72).

g. From August 15 to December 30, 2003, Sentry allegedly paid out over \$90 million, approximately \$65 million more than the July 22, 2003 transfer, thus more than exhausting the BLMIS funds received on July 22, 2003:

Date	Recipient	Amount	Source	Ex., Page
8/15/2003	Fairfield Sigma	(\$700,000)	09-01239 ECF 23-1 Ex. 8	8, at 10
8/15/2003	Fairfield Lambda	(1,700,000)	09-01239 ECF 23-1 Ex. 9	8, at 16
8/15/2003	Fairfield Investment Fund	(1,100,000)	09-01239 ECF 286-10	9, at 7
8/15/2003	Quilvest	(113,360)	11-02538 ECF 1-4	10(j), at 27
8/15/2003	Barclays Suisse	(26,317)	11-02569 ECF 1-7	10(u), at 50
8/15/2003	MLBS	(265,810)	11-02910 ECF 1-3	10(kk), at 84
8/15/2003	MLBS	(300,750)	11-02910 ECF 1-3	10(kk), at 84
8/15/2003	MLBS	(1,971,100)	11-02910 ECF 1-3	10(kk), at 84
8/15/2003	MLBS	(6,386,104)	11-02910 ECF 1-3	10(kk), at 84
8/15/2003	Credit Suisse London Nominees	(56,410)	11-02925 ECF 1-5	10(nn), at 92
8/15/2003	Credit Suisse London Nominees	(93,224)	11-02925 ECF 1-5	10(nn), at 92
8/15/2003	Credit Suisse AG, Nassau Branch	(149,727)	11-02925 ECF 1-5	10(nn), at 92
8/15/2003	Credit Suisse London Nominees	(154,873)	11-02925 ECF 1-5	10(nn), at 92

Date	Recipient	Amount	Source	Ex., Page
8/15/2003	Credit Suisse London Nominees	(708,540)	11-02925 ECF 1-5	10(nn), at 92
8/15/2003	Credit Suisse (Luxembourg)	(1,000,000)	11-02925 ECF 1-5	10(nn), at 92
8/15/2003	SICO	(32,628)	12-01005 ECF 1-6	10(rr), at 103
8/15/2003	SICO	(237,721)	12-01005 ECF 1-6	10(rr), at 103
8/15/2003	SICO	(384,083)	12-01005 ECF 1-6	10(rr), at 103
8/15/2003	BSI	(183,894)	12-01209 ECF 1-3	10(eee), at 135
8/15/2003	BSI	(320,364)	12-01209 ECF 1-3	10(eee), at 135
8/15/2003	ZCM	(130,000)	12-01512 ECF 1-6	10(mmm), at 154
8/15/2003	Citivic	(24,238)	12-01513 ECF 1-3	10(nnn), at 156
8/15/2003	Citivic	(149,158)	12-01513 ECF 1-3	10(nnn), at 156
8/15/2003	UKFP	(66,776)	12-01566 ECF 1-2	10(ppp), at 163
8/15/2003	Clariden	(63,113)	12-01676 ECF 1-5	10(www), at 178
8/15/2003	SG Suisse	(2,865,901)	12-01677 ECF 1-5	10(xxx), at 182
8/15/2003	EFG Bank	(150,000)	12-01690 ECF 1-7	10(aaaa), at 189
8/15/2003	Lombard Odier	(1,584,808)	12-01693 ECF 1-3	10(dddd), at 200
8/15/2003	Lombard Odier	(1,598,288)	12-01693 ECF 1-3	10(dddd), at 200
8/15/2003	Bordier	(203,079)	12-01695 ECF 1-3	10(ffff), at 206
8/15/2003	RBC-Jersey	(50,000)	12-01699 ECF 1-5	10(iiii), at 212
8/15/2003	RBC-Dominion	(88,507)	12-01699 ECF 1-5	10(iiii), at 212
9/17/2003	Fairfield Sigma	(10,500,000)	09-01239 ECF 23-1 Ex. 8	8, at 12
9/17/2003	Fairfield Lambda	(1,300,000)	09-01239 ECF 23-1 Ex. 9	8, at 17
9/17/2003	Fairfield Lambda	(2,100,000)	09-01239 ECF 23-1 Ex. 9	8, at 18
9/17/2003	Fairfield Investment Fund	(800,000)	09-01239 ECF 286-10	9, at 7
9/17/2003	Safra New York	(130,664)	11-01885 ECF 1-3	10(f), at 16
9/17/2003	Safra New York	(146,127)	11-01885 ECF 1-3	10(f), at 16
9/17/2003	Quilvest	(1,495,385)	11-02538 ECF 1-4	10(j), at 27
9/17/2003	Delta Bank	(140,353)	11-02551 ECF 1-4	10(o), at 37
9/17/2003	MLBS	(320,079)	11-02910 ECF 1-3	10(kk), at 84

Date	Recipient	Amount	Source	Ex., Page
9/17/2003	MLBS	(964,543)	11-02910 ECF 1-3	10(kk), at 84
9/17/2003	BJB	(18,686)	11-02922 ECF 1-3	10(ll), at 87
9/17/2003	BJB	(1,595,815)	11-02922 ECF 1-3	10(ll), at 87
9/17/2003	Credit Suisse London Nominees	(1,992,900)	11-02925 ECF 1-5	10(nn), at 92
9/17/2003	BSI	(14,015)	12-01209 ECF 1-3	10(eee), at 135
9/17/2003	ZCM	(380,000)	12-01512 ECF 1-6	10(mmm), at 154
9/17/2003	Clariden	(35,000)	12-01676 ECF 1-5	10(www), at 178
9/17/2003	Clariden	(46,398)	12-01676 ECF 1-5	10(www), at 178
9/17/2003	Clariden	(750,000)	12-01676 ECF 1-5	10(www), at 178
9/17/2003	SG Suisse	(633,000)	12-01677 ECF 1-5	10(xxx), at 182
9/17/2003	Lombard Odier	(140,148)	12-01693 ECF 1-3	10(dddd), at 200
9/17/2003	Lombard Odier	(725,171)	12-01693 ECF 1-3	10(dddd), at 200
9/17/2003	Bordier	(127,067)	12-01695 ECF 1-3	10(ffff), at 206
9/17/2003	Bordier	(3,272,168)	12-01695 ECF 1-3	10(ffff), at 206
9/18/2003 ³	Fairfield Sigma	(2,600,000)	09-01239 ECF 286-5	9, at 2
10/14/2003	Fairfield Sigma	(600,000)	09-01239 ECF 286-5	9, at 2
10/14/2003	Fairfield Lambda	(250,000)	09-01239 ECF 286-6	9, at 4
10/14/2003	Fairfield Investment Fund	(1,900,000)	09-01239 ECF 286-10	9, at 7
10/14/2003	Fairfield Investment Fund	(4,000,000)	09-01239 ECF 286-10	9, at 7
10/14/2003	Fairfield Investment Trust	(50,000)	09-01239 ECF 23-1 Ex. 16	8, at 21
10/14/2003	Quilvest	(178,309)	11-02538 ECF 1-4	10(j), at 27
10/14/2003	Quilvest	(228,214)	11-02538 ECF 1-4	10(j), at 27
10/14/2003	Quilvest	(424,544)	11-02538 ECF 1-4	10(j), at 27
10/14/2003	Barclays Suisse	(268,887)	11-02569 ECF 1-7	10(u), at 50
10/14/2003	Inteligo	(28,470)	11-02763 ECF 1-4	10(ii), at 80
10/14/2003	MLBS	(295,235)	11-02910 ECF 1-3	10(kk), at 84
10/14/2003	MLBS	(370,819)	11-02910 ECF 1-3	10(kk), at 84
10/14/2003	BJB	(1,792,705)	11-02922 ECF 1-3	10(ll), at 87
10/14/2003	Credit Suisse	(2,000,000)	11-02925 ECF 1-5	10(nn), at

³ This date comes from the Fairfield SAC. The Fairfield Amended Complaint (09-01239 ECF 23-1 Ex. 8) lists a redemption for the same amount but on September 17, 2003. Whether the transaction occurred on September 17 or 18 is irrelevant for the purposes of this analysis, given both dates fall within the specified range. Only one of the transfers has been counted in this analysis.

Date	Recipient	Amount	Source	Ex., Page
	(Luxembourg)			92
10/14/2003	Credit Suisse (Luxembourg)	(2,149,002)	11-02925 ECF 1-5	10(nn), at 92
10/14/2003	Credit Suisse (Luxembourg)	(3,500,000)	11-02925 ECF 1-5	10(nn), at 92
10/14/2003	SNS Defendants	(26,405)	12-01046 ECF 1-3	10(ww), at 118
10/14/2003	BSI	(130,355)	12-01209 ECF 1-3	10(eee), at 135
10/14/2003	ZCM	(20,000)	12-01512 ECF 1-6	10(mmm), at 154
10/14/2003	ZCM	(150,000)	12-01512 ECF 1-6	10(mmm), at 154
10/14/2003	ZCM	(1,060,000)	12-01512 ECF 1-6	10(mmm), at 154
10/14/2003	Citivic	(74,500)	12-01513 ECF 1-3	10(nnn), at 156
10/14/2003	UKFP	(62,683)	12-01566 ECF 1-2	10(ppp), at 163
10/14/2003	UKFP	(1,342,152)	12-01566 ECF 1-2	10(ppp), at 163
10/14/2003	Clariden	(99,961)	12-01676 ECF 1-5	10(www), at 178
10/14/2003	Clariden	(100,000)	12-01676 ECF 1-5	10(www), at 178
10/14/2003	SG Suisse	(188,201)	12-01677 ECF 1-5	10(xxx), at 182
10/14/2003	SG Suisse	(205,713)	12-01677 ECF 1-5	10(xxx), at 182
10/14/2003	EFG Bank	(210,928)	12-01690 ECF 1-7	10(aaaa), at 189
10/14/2003	Lombard Odier	(33,006)	12-01693 ECF 1-3	10(dddd), at 200
11/19/2003	Fairfield Investment Fund	(800,000)	09-01239 ECF 286-10	9, at 7
11/19/2003	Quilvest	(578,080)	11-02538 ECF 1-4	10(j), at 27
11/19/2003	Barclays Spain	(301,681)	11-02569 ECF 1-4	10(t), at 48
11/19/2003	Inteligo	(323,839)	11-02763 ECF 1-4	10(ii), at 80
11/19/2003	MLBS	(366,608)	11-02910 ECF 1-3	10(kk), at 84
11/19/2003	BJB	(19,110)	11-02922 ECF 1-3	10(ll), at 87
11/19/2003	BJB	(38,220)	11-02922 ECF 1-3	10(ll), at 87
11/19/2003	BJB	(217,855)	11-02922 ECF 1-3	10(ll), at 87
11/19/2003	BJB	(229,321)	11-02922 ECF 1-3	10(ll), at 87
11/19/2003	Credit Suisse (Luxembourg)	(100,000)	11-02925 ECF 1-5	10(nn), at 92
11/19/2003	Credit Suisse London Nominees	(519,354)	11-02925 ECF 1-5	10(nn), at 92
11/19/2003	SNS Defendants	(119,438)	12-01046 ECF 1-3	10(ww), at 118

Date	Recipient	Amount	Source	Ex., Page
11/19/2003	Lloyds	(239,315)	12-01207 ECF 1-3	10(ddd), at 133
11/19/2003	Lloyds	(262,362)	12-01207 ECF 1-3	10(ddd), at 133
11/19/2003	Lloyds	(369,904)	12-01207 ECF 1-3	10(ddd), at 133
11/19/2003	Lloyds	(473,920)	12-01207 ECF 1-3	10(ddd), at 133
11/19/2003	BSI	(225,317)	12-01209 ECF 1-3	10(eee), at 135
11/19/2003	Banca Del Gottardo	(2,039,044)	12-01209 ECF 1-4	10(fff), at 139
11/19/2003	ZCM	(135,000)	12-01512 ECF 1-6	10(mmm), at 154
11/19/2003	Citivic	(139,503)	12-01513 ECF 1-3	10(nnn), at 156
11/19/2003	UKFP	(29,563)	12-01566 ECF 1-2	10(ppp), at 163
11/19/2003	UKFP	(38,010)	12-01566 ECF 1-2	10(ppp), at 163
11/19/2003	SG Suisse	(143,326)	12-01677 ECF 1-5	10(xxx), at 182
11/21/2003 ⁴	Fairfield Sigma	(2,150,000)	09-01239 ECF 286-5	9, at 2
11/24/2003	Lombard Odier	(287,177)	12-01693 ECF 1-3	10(dddd), at 200
11/28/2003	Lloyds	(369,904)	12-01207 ECF 1-3	10(ddd), at 133
12/18/2003	Fairfield Investment Fund	(1,000,000)	09-01239 ECF 286-10	9, at 7
12/18/2003	Fairfield Lambda	(175,000)	09-01239 ECF 286-6	9, at 4
12/18/2003	Quilvest	(1,374,582)	11-02538 ECF 1-4	10(j), at 27
12/18/2003	Inteligo	(112,664)	11-02763 ECF 1-4	10(ii), at 80
12/18/2003	MLBS	(2,915,888)	11-02910 ECF 1-3	10(kk), at 84
12/18/2003	BJB	(150,000)	11-02922 ECF 1-3	10(ll), at 87
12/18/2003	Credit Suisse AG, Nassau Branch	(25,000)	11-02925 ECF 1-5	10(nn), at 92
12/18/2003	Credit Suisse Nominees (Guernsey)	(38,191)	11-02925 ECF 1-5	10(nn), at 92
12/18/2003	Credit Suisse (Luxembourg)	(350,000)	11-02925 ECF 1-5	10(nn), at 92
12/18/2003	Credit Suisse Nominees (Guernsey)	(354,222)	11-02925 ECF 1-5	10(nn), at 92
12/18/2003	Credit Suisse London Nominees	(782,707)	11-02925 ECF 1-5	10(nn), at 92
12/18/2003	SNS Defendants	(27,689)	12-01046 ECF 1-3	10(ww), at 118

⁴ This date comes from the Fairfield SAC. The Fairfield Amended Complaint (09-01239 ECF 23-1 Ex. 8) lists a redemption for the same amount but on November 21, 2003. Whether the transfer occurred on November 18 or the 21 is irrelevant, given both dates fall within the specified range. Only one transfer has been counted in this analysis.

Date	Recipient	Amount	Source	Ex., Page
12/18/2003	SNS Defendants	(151,809)	12-01046 ECF 1-3	10(ww), at 118
12/18/2003	Lombard Odier	(28,643)	12-01693 ECF 1-3	10(dddd), at 200
12/18/2003	Lombard Odier	(530,149)	12-01693 ECF 1-3	10(dddd), at 200
12/30/2003	ASB	(990,000)	11-02730 ECF 1-4	10(aa), at 64
Total		(\$94,348,776)		

- h. Through the pleadings referenced in the above tables, the Trustee alleges that from May 9 to December 30, 2003 Sentry paid out approximately \$238 million in redemptions, while receiving only \$120 million from BLMIS.
- i. According to the Complaint's exhibits, between July 23, 2003 and March 15, 2005, Sentry did not receive any further transfers from BLMIS (*See* Compl. Ex. B at 20-23, 51-54, 66, 72).
- j. From January 1, 2004 until March 14, 2005, Sentry continued to make distributions from its accounts, totaling at over \$350 million:

Recipient	Amount Received 1/1/2004 – 3/14/2005	Source	Ex., Page
ABN AMRO Defendants	(\$4,750,000)	12-01697 ECF 1-3	10(gggg), at 208
Arden Management	(12,586,659)	12-01023 ECF 1-3	10(vv), at 116
ASB	(34,200,784)	11-02730 ECF 1-4	10(aa), at 64
Banc Leu	(996,699)	12-01209 ECF 1-4	10(www), at 178
Banca Del Gottardo	(2,794,294)	12-01019 ECF 1-6	10(fff), at 139
Banco Itau	(1,006,045)	12-01676 ECF 1-5	10(ss), at 105
Bank Vontobel	(270,252)	12-01202 ECF 1-9	10(bbb), at 129
Barclays Spain	(146,471)	11-02569 ECF 1-4	10(t), at 48
Barclays Suisse	(1,241,152)	11-02569 ECF 1-7	10(u), at 50

BBH	(604,273)	12-01670 ECF 1-9	10(uuu), at 173
BD Lux	(115,906)	12-01691 ECF 1-4	10(cccc), at 198
BG Valores	(1,277,427)	12-01048 ECF 1-3	10(yy), at 123
BJB	(10,156,084)	11-02922 ECF 1-3	10(ll), at 87
Bordier	(6,872)	12-01695 ECF 1-3	10(ffff), at 206
BPES	(2,028,299)	11-02571 ECF 1-4	10(x), at 57
BSI	(3,561,336)	12-01209 ECF 1-3	10(eee), at 135
Citivic	(500,440)	12-01513 ECF 1-3	10(nnn), at 156
Clariden	(1,178,152)	12-01676 ECF 1-5	10(www), at 178
Credit Suisse (Luxembourg)	(680,000)	11-02925 ECF 1-5	10(nn), at 92
Credit Suisse AG	(88,753)	11-02925 ECF 1-5	10(nn), at 92
Credit Suisse AG, Nassau Branch	(282,000)	11-02925 ECF 1-5	10(nn). at 92
Credit Suisse London Nominees	(6,351,764)	11-02925 ECF 1-5	10(nn), at 92
Credit Suisse Nominees (Guernsey)	(421,957)	11-02925 ECF 1-5	10(nn), at 92
Credit Suisse Wealth Management	(2,793,721)	11-02925 ECF 1-5	10(nn), at 92
Delta Bank	(1,497,403)	11-02551 ECF 1-4	10(o), at 37
Dexia Banque	(46,627)	12-01698 ECF 1-5	10(hhhh), at 210
EFG Bank	(2,330,790)	12-01690 ECF 1-7	10(aaaa), at 189
Fairfield Investment Fund	(7,757,812)	09-1239 ECF 286-10	9, at 7
Fairfield Investment Trust	(1,835,000)	09-1239 ECF 23-1 Ex. 16	8, at 22- 23, 27-29
Fairfield Lambda	(12,260,000)	09-1239 ECF 23-1 Ex. 9	9, at 4
Fairfield Sigma	(45,500,000)	09-1239 ECF 23-1 Ex. 8	9, at 2
Falcon	(38,091,032)	11-02923 ECF 1-3	10(mm), at 90
FIF Advanced Ltd.	(10,260,000)	09-1239 ECF 23-1 Ex. 18	9, at 6

Guernroy or RBC-CI	(99,965)	12-01699 ECF 1-5	10(iiii), at 212
Inteligo	(2,294,083)	11-02763 ECF 1-4	10(ii), at 80
KEB	(2,527,851)	11-02572 ECF 1-3	10(y), at 60
Kookmin Bank	(1,064,388)	12-01194 ECF 1-3	10(zz), at 125
LGT Liechtenstein	(1,686,156)	11-02929 ECF 1-3	10(oo), at 97
Lloyds	(1,775,063)	12-01207 ECF 1-3	10(ddd), at 133
Lombard Odier	(2,025,653)	12-01693 ECF 1-3	10(dddd), at 200
Medium Volatility	(3,740,436)	12-01680 ECF 1-4	10(zzz), at 187
MLBS	(8,391,330)	11-02910 ECF 1-3	10(kk), at 84
Naidot	(5,900,000)	11-02733 ECF 1-3	10(dd), at 70
Orbita	(30,662,226)	11-02537 ECF 1-3	10(i), at 25
PIFSS	(20,000,000)	12-01002 ECF 1-3	10(pp), at 99
Quilvest	(8,511,368)	11-02538 ECF 1-4	10(j), at 27
RBC	(1,108,287)	12-01699 ECF 1-5	10(iiii), at 212
RBC-Jersey	(128,459)	12-01699 ECF 1-5	10(iiii), at 212
RBC-Suisse	(588,302)	12-01699 ECF 1-5	10(iiii), at 212
Safra New York	(38,881,040)	11-01885 ECF 1-3	10(f), at 16
Schroder & Co. Bank AG	(2,626,852)	12-01210 ECF 1-14	10(ggg), at 142
SG Suisse	(11,708,118)	12-01677 ECF 1-5	10(xxx), at 182
SG UK	(3,862,228)	12-01677 ECF 1-5	10(xxx), at 182
SICO	(272,233)	12-01005 ECF 1-6	10(rr), at 103
SNS Defendants	(1,692,088)	12-01046 ECF 1-3	10(ww), at 118
Somers Dublin	(1,685,648)	11-02784 ECF 1-3	10(jj), at 82
Standard Chartered Defendants	(23,743)	12-01565 ECF 1-6	10(ooo), at 158

Trincastar	(4,000,000)	11-02731 ECF 1-3	10(bb), at 66
UBS Deutschland	(869,312)	12-01577 ECF 1-3	10(rrr), at 167
UKFP	(2,075,676)	12-01566 ECF 1-2	10(ppp), at 163
ZCM	(2,380,000)	12-01512 ECF 1-6	10(mmm), at 154
Total	(\$368,198,509)		

k. On March 15, 2005 Sentry allegedly transferred \$8 million to the Grosvenor Defendants, as well as \$80 million to others, having not received BLMIS funds since July 2003.

Date	Recipient	Amount	Source	Ex., Page
3/15/2005	Safra New York	(\$117,162)	11-01885 ECF 1-3	10(f), at 16
3/15/2005	Safra New York	(351,445)	11-01885 ECF 1-3	10(f), at 16
3/15/2005	Safra New York	(1,077,355)	11-01885 ECF 1-3	10(f), at 16
3/15/2005	Safra New York	(1,764,084)	11-01885 ECF 1-3	10(f), at 16
3/15/2005	Grosvenor Balanced	(\$8,000,000)	12-01021 ECF 1-4	1, at 98
3/15/2005	BPES	(403,508)	11-02571 ECF 1-4	10(x), at 57
3/15/2005	KEB	(3,493,631)	11-02572 ECF 1-3	10(y), at 60
3/15/2005	ASB	(20,185,729)	11-02730 ECF 1-4	10(aa), at 64
3/15/2005	ABN Switzerland	(537,462)	11-02760 ECF 1-3	10(ff), at 74
3/15/2005	MLBS	(162,293)	11-02910 ECF 1-3	10(kk), at 84
3/15/2005	BJB	(103,464)	11-02922 ECF 1-3	10(ll), at 87
3/15/2005	BJB	(181,785)	11-02922 ECF 1-3	10(ll), at 87
3/15/2005	Credit Suisse London Nominees	(25,628)	11-02925 ECF 1-5	10(nn), at 92
3/15/2005	Credit Suisse London Nominees	(2,102,378)	11-02925 ECF 1-5	10(nn), at 92
3/15/2005	Credit Suisse London Nominees	(13,871,693)	11-02925 ECF 1-5	10(nn), at 92
3/15/2005	Banco Itau	(132,951)	12-01019 ECF 1-6	10(ss), at 105
3/15/2005	Banco Itau	(144,704)	12-01019 ECF 1-	10(ss), at

Date	Recipient	Amount	Source	Ex., Page
			6	105
3/15/2005	Banco Itau	(300,000)	12-01019 ECF 1-6	10(ss), at 105
3/15/2005	Multi-Strategy Fund	(25,763,374)	12-01205 ECF 1-6	10(ccc), at 131
3/15/2005	SNS Defendants	(385,402)	12-01046 ECF 1-3	10(ww), at 118
3/15/2005	BG Valores	(652,565)	12-01048 ECF 1-3	10(yy), at 123
3/15/2005	Lloyds	(264,949)	12-01207 ECF 1-3	10(ddd), at 133
3/15/2005	BSI	(52,487)	12-01209 ECF 1-3	10(eee), at 135
3/15/2005	Schroder & Co. Bank AG	(61,043)	12-01210 ECF 1-14	10(ggg), at 142
3/15/2005	ZCM	(70,000)	12-01512 ECF 1-6	10(mmm), at 154
3/15/2005	SG Suisse	(90,706)	12-01677 ECF 1-5	10(xxx), at 182
3/15/2005	Low Volatility	(6,913,079)	12-01680 ECF 1-3	10(yyy), at 185
3/15/2005	ABN AMRO Defendants	(1,000,000)	12-01697 ECF 1-3	10(gggg), at 208
3/15/2005	Dexia Banque Suisse	(7,408)	12-01698 ECF 1-5	10(hhhh), at 210
3/15/2005	RBC-Suisse	(17,082)	12-01699 ECF 1-5	10(iiii), at 212
Total		(\$80,233,367)		

1. On April 1, 2005, BLMIS transferred \$175 million into Sentry (Compl. Ex. B at 23).

Three days later, Sentry paid out \$200 million to a single recipient, thereby extinguishing any BLMIS funds from the April 1 transfer.

Date	Recipient	Amount	Source	Ex., Page
4/4/2005	ADIA	(200,000,000)	12-2493 ECF 1-5	10(h), at 23

- m. On July 6, 2005 BLMIS transferred \$85 million to Sentry (Compl. Ex. B at 54).

- n. From July 13 to July 25, 2005, Sentry paid out approximately \$114 million to other parties, over \$25 million more than the BLMIS transfer on July 6, and therefore removing any BLMIS funds from Sentry:

Date	Recipient	Amount	Source	Ex., Page
7/13/2005	Fairfield Greenwich (Bermuda) Ltd	(\$10,815,000)	09-01239 ECF 286-13	9, at 16

Date	Recipient	Amount	Source	Ex., Page
7/13/2005	Fairfield Greenwich (Bermuda) Ltd	(6,175,000)	09-01239 ECF 286-13	9, at 16
7/13/2005	Fairfield Greenwich Advisors	(1,340,000)	09-01239 ECF 286-14	9, at 22
7/15/2005	Lion Global	(505,479)	11-02540 ECF 1-4	10(l), at 31
7/15/2005	Lion Global	(33,397,116)	11-02540 ECF 1-4	10(l), at 31
7/15/2005	Lion Global	(2,527,405)	11-02540 ECF 1-4	10(l), at 31
7/15/2005	Lion Global	(2,527,405)	11-02540 ECF 1-4	10(l), at 31
7/15/2005	Lion Global	(10,109,600)	11-02540 ECF 1-4	10(l), at 31
7/15/2005	Lion Global	(1,516,437)	11-02540 ECF 1-4	10(l), at 31
7/15/2005	Delta Bank	(59,790)	11-02551 ECF 1-4	10(o), at 37
7/15/2005	Delta Bank	(109,914)	11-02551 ECF 1-4	10(o), at 37
7/15/2005	Delta Bank	(272,699)	11-02551 ECF 1-4	10(o), at 37
7/15/2005	Delta Bank	(1,246,505)	11-02551 ECF 1-4	10(o), at 37
7/15/2005	Barclays Spain	(2,685,870)	11-02569 ECF 1-4	10(t), at 48
7/15/2005	B PES	(105,636)	11-02571 ECF 1-4	10(x), at 57
7/15/2005	MLBS	(128,876)	11-02910 ECF 1-3	10(kk), at 84
7/15/2005	MLBS	(287,140)	11-02910 ECF 1-3	10(kk), at 84
7/15/2005	MLBS	(848,257)	11-02910 ECF 1-3	10(kk), at 84
7/15/2005	BJB	(528,867)	11-02922 ECF 1-3	10(ll), at 87
7/15/2005	Credit Suisse AG	(41,304)	11-02925 ECF 1-5	10(nn), at 93
7/15/2005	SICO	(36,973)	12-01005 ECF 1-6	10(rr), at 103
7/15/2005	SICO	(151,736)	12-01005 ECF 1-6	10(rr), at 103
7/15/2005	Banco Itau	(118,365)	12-01019 ECF 1-6	10(ss), at 105
7/15/2005	Credit Agricole Suisse	(251,414)	12-01022 ECF 1-10	10(uu), at 113
7/15/2005	SNS Defendants	(201,564)	12-01046 ECF 1-3	10(ww), at 118

Date	Recipient	Amount	Source	Ex., Page
7/15/2005	Kookmin Bank	(529,522)	12-01194 ECF 1-3	10(zz), at 125
7/15/2005	Kookmin Bank	(754,769)	12-01194 ECF 1-3	10(zz), at 125
7/15/2005	Kookmin Bank	(535,944)	12-01194 ECF 1-3	10(zz), at 125
7/15/2005	Kookmin Bank	(686,000)	12-01194 ECF 1-3	10(zz), at 125
7/15/2005	Kookmin Bank	(476,566)	12-01194 ECF 1-3	10(zz), at 125
7/15/2005	Kookmin Bank	(423,611)	12-01194 ECF 1-3	10(zz), at 125
7/15/2005	Kookmin Bank	(2,210,360)	12-01194 ECF 1-3	10(zz), at 125
7/15/2005	Kookmin Bank	(476,566)	12-01194 ECF 1-3	10(zz), at 125
7/15/2005	Kookmin Bank	(413,026)	12-01194 ECF 1-3	10(zz), at 125
7/15/2005	Kookmin Bank	(1,397,924)	12-01194 ECF 1-3	10(zz), at 125
7/15/2005	Bank Vontobel	(68,663)	12-01202 ECF 1-9	10(bbb), at 129
7/15/2005	BSI	(21,127)	12-01209 ECF 1-3	10(eee), at 135
7/15/2005	BSI	(54,931)	12-01209 ECF 1-3	10(eee), at 135
7/15/2005	Banca Del Gottardo	(81,150)	12-01209 ECF 1-4	10(fff), at 139
7/15/2005	Banca Del Gottardo	(107,812)	12-01209 ECF 1-4	10(fff), at 139
7/15/2005	Banca Del Gottardo	(212,117)	12-01209 ECF 1-4	10(fff), at 139
7/15/2005	Schroder & Co. Bank AG	(38,029)	12-01210 ECF 1-14	10(ggg), at 142
7/15/2005	ZCM	(660,000)	12-01512 ECF 1-6	10(mmm), at 154
7/15/2005	UKFP	(49,575)	12-01566 ECF 1-2	10(ppp), at 163
7/15/2005	UKFP	(21,782)	12-01566 ECF 1-2	10(ppp), at 163
7/15/2005	BNP Paribas	(10,564)	12-01576 ECF 1-3	10(qqq), at 165
7/15/2005	UBS Deutschland	(6,105,509)	12-01577 ECF 1-3	10(rrr), at 167
7/15/2005	Clariden/Bank Leu	(44,071)	12-01676 ECF 1-5	10(www), at 178
7/15/2005	SG Suisse	(232,315)	12-01677 ECF 1-5	10(xxx),

Date	Recipient	Amount	Source	Ex., Page
				at 182
7/15/2005	EFG Bank	(950,724)	12-01690 ECF 1-7	10(aaaa), at 189
7/15/2005	EFG Bank	(714,638)	12-01690 ECF 1-7	10(aaaa), at 189
7/15/2005	EFG Bank	(472,161)	12-01690 ECF 1-7	10(aaaa), at 190
7/15/2005	EFG Bank	(403,656)	12-01690 ECF 1-7	10(aaaa), at 190
7/15/2005	EFG Bank	(255,734)	12-01690 ECF 1-7	10(aaaa), at 190
7/15/2005	EFG Bank	(227,952)	12-01690 ECF 1-7	10(aaaa), at 190
7/15/2005	EFG Bank	(120,636)	12-01690 ECF 1-7	10(aaaa), at 190
7/15/2005	EFG Bank	(111,129)	12-01690 ECF 1-7	10(aaaa), at 190
7/15/2005	EFG Bank	(60,286)	12-01690 ECF 1-7	10(aaaa), at 190
7/15/2005	EFG Bank	(41,177)	12-01690 ECF 1-7	10(aaaa), at 190
7/15/2005	EFG Bank	(31,691)	12-01690 ECF 1-7	10(aaaa), at 190
7/15/2005	EFG Bank	(26,842)	12-01690 ECF 1-7	10(aaaa), at 190
7/15/2005	Lombard Odier	(4,753,516)	12-01693 ECF 1-3	10(dddd), at 200
7/15/2005	Lombard Odier	(1,115,728)	12-01693 ECF 1-3	10(dddd), at 200
7/15/2005	RBC-Suisse	(105,044)	12-01699 ECF 1-5	10(iiii), at 212
7/15/2005	Fairfield Lambda	(4,125,000)	09-01239 ECF 23-1 Ex. 9	9, at 4
7/15/2005	Fairfield Sigma	(8,300,000)	09-01239 ECF 23-1 Ex. 8	9, at 2
7/25/2005	Fairfield Investment Fund	(1,224,060)	09-01239 ECF 286-10	9, at 7
7/25/2005	Fairfield Investment Fund	(40,597)	09-01239 ECF 286-10	9, at 7
7/25/2005	Fairfield Lambda	(81,202)	09-01239 ECF 286-6	9, at 4
Total		(\$114,762,058)		

o. On September 2, 2005 Sentry received \$30 million of BLMIS funds (Compl. Ex. B at 24).

p. From September 15 through September 26, 2005, Sentry paid out approximately \$44

million to other parties, thereby removing any BLMIS funds remaining from the
September 2 transfer:

Date	Recipient	Amount	Source	Ex., Page
9/15/2005	Delta Bank	(\$119,929)	11-02551 ECF 1-4	10(o), at 37
9/15/2005	Barclays Suisse	(370,806)	11-02569 ECF 1-7	10(u), at 50
9/15/2005	MLBS	(638,114)	11-02910 ECF 1-3	10(kk), at 84
9/15/2005	BJB	(250,000)	11-02922 ECF 1-3	10(ll), at 87
9/15/2005	Credit Suisse London Nominees	(5,191,098)	11-02925 ECF 1-5	10(nn), at 92
9/15/2005	SICO	(58,810)	12-01005 ECF 1-6	10(rr), at 103
9/15/2005	SICO	(60,388)	12-01005 ECF 1-6	10(rr), at 103
9/15/2005	SICO	(105,944)	12-01005 ECF 1-6	10(rr), at 103
9/15/2005	SICO	(1,003,146)	12-01005 ECF 1-6	10(rr), at 103
9/15/2005	Credit Agricole Suisse	(18,424)	12-01022 ECF 1-10	10(uu), at 113
9/15/2005	Credit Agricole Suisse	(63,418)	12-01022 ECF 1-10	10(uu), at 113
9/15/2005	Credit Agricole Suisse	(105,994)	12-01022 ECF 1-10	10(uu), at 113
9/15/2005	SNS Defendants	(98,846)	12-01046 ECF 1-3	10(ww), at 118
9/15/2005	BG Valores	(209,908)	12-01048 ECF 1-3	10(yy), at 123
9/15/2005	Bank Vontobel	(1,005,847)	12-01202 ECF 1-3	10(bbb), at 129
9/15/2005	Lloyds	(300,000)	12-01207 ECF 1-3	10(ddd), at 133
9/15/2005	BSI	(30,724)	12-01209 ECF 1-3	10(eee), at 135
9/15/2005	ZCM	(250,000)	12-01512 ECF 1-6	10(mmm), at 154
9/15/2005	Citivic	(283,931)	12-01513 ECF 1-3	10(nnn), at 156
9/15/2005	UKFP	(7,395)	12-01566 ECF 1-2	10(ppp), at 163
9/15/2005	UKFP	(7,384)	12-01566 ECF 1-2	10(ppp), at 163
9/15/2005	LGT Switzerland		12-01577 ECF 1-4	10(sss), at

Date	Recipient	Amount	Source	Ex., Page
		(26,486)		169
9/15/2005	Clariden	(30,830)	12-01676 ECF 1-5	10(www), at 178
9/15/2005	SG Suisse	(59,265)	12-01677 ECF 1-5	10(xxx), at 182
9/15/2005	EFG Bank	(736,134)	12-01690 ECF 1-7	10(aaaa), at 190
9/15/2005	EFG Bank	(700,134)	12-01690 ECF 1-7	10(aaaa), at 190
9/15/2005	EFG Bank	(426,638)	12-01690 ECF 1-7	10(aaaa), at 190
9/15/2005	EFG Bank	(343,419)	12-01690 ECF 1-7	10(aaaa), at 190
9/15/2005	EFG Bank	(339,711)	12-01690 ECF 1-7	10(aaaa), at 190
9/15/2005	EFG Bank	(300,000)	12-01690 ECF 1-7	10(aaaa), at 190
9/15/2005	EFG Bank	(172,478)	12-01690 ECF 1-7	10(aaaa), at 190
9/15/2005	EFG Bank	(110,881)	12-01690 ECF 1-7	10(aaaa), at 190
9/15/2005	EFG Bank	(105,944)	12-01690 ECF 1-7	10(aaaa), at 190
9/15/2005	EFG Bank	(60,420)	12-01690 ECF 1-7	10(aaaa), at 190
9/15/2005	EFG Bank	(58,058)	12-01690 ECF 1-7	10(aaaa), at 190
9/15/2005	EFG Bank	(20,000)	12-01690 ECF 1-7	10(aaaa), at 190
9/15/2005	EFG Bank	(12,000)	12-01690 ECF 1-7	10(aaaa), at 190
9/15/2005	Lombard Odier	(1,305,183)	12-01693 ECF 1-3	10(dddd), at 200
9/15/2005	Lombard Odier	(151,362)	12-01693 ECF 1-3	10(dddd), at 200
9/15/2005	ABN AMRO Defendants	(1,000,000)	12-01697 ECF 1-3	10(gggg), at 208
9/15/2005	Guernroy or RBC-CI	(25,000)	12-01699 ECF 1-5	10(iiii), at 212
9/15/2005	FIF Advanced Ltd.	(1,750,000)	09-01239 ECF 286-8	9, at 6
9/15/2005	Fairfield Investment Fund	(5,570,000)	09-01239 ECF 286-10	9, at 7
9/20/2005	Koch Investment	(16,533,871)	12-01047 ECF 1-3	10(xx), at 121
9/26/2005	Fairfield Greenwich (Bermuda) Ltd	(3,124,599)	09-01239 ECF 286-13	9, at 16
9/26/2005	Fairfield Greenwich Advisors	(1,026,575)	09-01239 ECF 286-14	9, at 22

Date	Recipient	Amount	Source	Ex., Page
Total		(\$44,169,094)		

q. From October 3, 2005, until April 12, 2006, BLMIS transferred \$785 million into Sentry (Compl. Ex. B at 24, 55-56). During this period, Sentry allegedly paid out approximately \$660 million, including \$11.8 million to the Grosvenor Defendants (Compl. Exs. D, E):

Recipient	Amount Received 10/03/2005 - 4/12/2006	Source	Ex., Page
ABN AMRO Defendants	(\$3,500,000)	12-01697 ECF 1-3	10(gggg), at 208
ADIA	(100,000,000)	11-02493 ECF 1-5	10(h), at 23
Agricole Credit (Suisse)	(580,444)	12-01022 ECF 1-10	10(uu), at 113
Banca Del Gottardo	(373,871)	12-01209 ECF 1-4	10(fff), at 139
Banco Itau	(630,229)	12-01019 ECF 1-6	10(ss), at 105
Bank Vontobel	(2,352,070)	12-01202 ECF 1-9	10(bbb), at 129
Barclays Spain	(321,571)	11-02569 ECF 1-4	10(t), at 48
Barclays Suisse	(12,907,013)	11-02569 ECF 1-7	10(u), at 50
Barfield Defendants	(4,912,440)	12-01669 ECF 1-9	10(ttt), at 171
BBH	(736,648)	12-01670 ECF 1-9	10(uuu), at 173
BG Valores	(1,453,299)	12-01048 ECF 1-3	10(yy), at 123
BJB	(2,406,600)	11-02922 ECF 1-3	10(ll), at 87
BNP Paribas	(498,391)	12-01576 ECF 1-3	10(qqq), at 165
BPES	(271,470)	11-02571 ECF 1-4	10(x), at 57
BSI	(2,690,427)	12-01209 ECF 1-3	10(eee), at 135
Citibank, N.A. et al	(30,000,000)	10-05345 ECF 1-1	10(iiii), at 3
Citivic	(44,580,982)	12-01513 ECF 1-3	10(nnn), at 156
Clariden/Bank Leu	(2,907,991)	12-01676 ECF 1-5	10(www), at 178
Credit Suisse AG	(1,921,653)	11-02925 ECF 1-5	10(nn), at 93
Credit Suisse London Nominees Ltd.	(15,022,883)	11-02925 ECF 1-5	10(nn), at 93

Recipient	Amount Received 10/03/2005 - 4/12/2006	Source	Ex., Page
Credit Suisse Nominees (Guernsey)	(1,500,000)	11-02925 ECF 1-5	10(nn), at 93
Delta Bank	(1,024,603)	11-02551 ECF 1-4	10(o), at 37
Dexia Banque	(6,331,569)	12-01698 ECF 1-5	10(hhhh), at 210
Dexia Banque Suisse	(1,340,308)	12-01698 ECF 1-5	10(hhhh), at 210
EFG Bank	(33,092,298)	12-01690 ECF 1-7	10(aaaa), at 190-191
Fullerton	(10,290,445)	12-01004 ECF 1-3	10(qq), at 101
Grosvenor Balanced	(5,000,000)	12-01021 ECF 1-4	1, at 98
Grosvenor Reserve	(6,815,102)	12-01021 ECF 1-5	1, at 99
Guernroy or RBC-CI	(121,743)	12-01699 ECF 1-5	10(iiii), at 212
Inteligo	(1,516,494)	11-02763 ECF 1-4	10(ii), at 80
KEB	(6,319,245)	11-02572 ECF 1-3	10(y), at 60
Kookmin Bank	(384,169)	12-01194 ECF 1-3	10(zz), at 125
LGT Liechtenstein	(1,790,706)	11-02929 ECF 1-3	10(oo), at 97
LGT Switzerland	(329,529)	12-01577 ECF 1-4	10(sss), at 169
Lloyds	(1,293,163)	12-01207 ECF 1-3	10(ddd), at 133
Lombard Odier	(19,984,649)	12-01693 ECF 1-3	10(dddd), at 200-201
MLBS	(3,056,209)	11-02910 ECF 1-3	10(kk), at 84
Naidot	(3,754,907)	11-02733 ECF 1-3	10(dd), at 70
RBC	(1,487,265)	12-01699 ECF 1-5	10(iiii), at 212
RBC-Dominion	(150,000)	12-01699 ECF 1-5	10(iiii), at 212
Safra New York	(4,046,438)	11-01885 ECF 1-3	10(f), at 16
Schroder & Co. Bank AG	(2,068,997)	12-01210 ECF 1-14	10(ggg), at 142
Fairfield Greenwich (Bermuda) Ltd	(51,793,758)	09-01239 ECF 286-13	9, at 16
Fairfield Greenwich Advisors	(3,788,312)	09-01239 ECF 286-14	9, at 22
Fairfield Investment Fund	(109,869,691)	09-01239 ECF 286-10	9, at 7
FIF Advanced Ltd.	(18,900,000)	09-01239 ECF 286-	9, at 6

Recipient	Amount Received 10/03/2005 - 4/12/2006	Source	Ex., Page
		8	
Fairfield Lambda	(8,542,824)	09-01239 ECF 286-6	9, at 4
Fairfield Sigma	(72,884,255)	09-01239 ECF 286-5	9, at 2
SG Suisse	(1,512,011)	12-01677 ECF 1-5	10(xxx), at 182
SGBT Lux/OFI	(5,845,555)	12-01677 ECF 1-5	10(xxx), at 182
SGBT Lux/Palmare	(13,732,259)	12-01677 ECF 1-5	10(xxx), at 182
Sico	(613,989)	12-01005 ECF 1-6	10(rr), at 103
SNS Defendants	(3,860,287)	12-01046 ECF 1-3	10(ww), at 118
Somers Dublin	(300,000)	11-02784 ECF 1-3	10(jj), at 82
The Standard Chartered Defendants	(9,613,549)	12-01565 ECF 1-6	10(ooo), at 158
Trincaster	(311,800)	11-02731 ECF 1-3	10(bb), at 66
UBS Deutschland	(224,146)	12-01577 ECF 1-3	10(rrr), at 167
UKFP	(63,892)	12-01566 ECF 1-2	10(ppp), at 163
Unifortune	(16,333,580)	11-02553 ECF 1-3	10(p), at 40
ZCM	(2,350,000)	12-01512 ECF 1-6	10(mmm), at 154
Total	(\$660,305,729)		

r. On April 13, 2006, BLMIS transferred \$120 million⁵ into Sentry (Compl. Ex. B at 25).

According to the Complaint, no further BLMIS funds were transferred into Sentry until September 2007 (*Id.* Ex. B at 25-29, 56-60, 67-68, 73-74).

s. Taking into account this additional \$120 million of BLMIS funds, and subtracting the total alleged subsequent transfers described in the above table, the amount of BLMIS funds in Sentry's accounts as of April 13, 2006 totaled at approximately \$240 million.

t. From April 13, 2006 until July 17, 2007, Sentry paid out approximately \$700 million,

⁵ BLMIS also transferred \$120,000 into Sentry on May 13, 2006, but the Trustee's exhibits demonstrate the amount was immediately returned the same day (Compl. Ex. B at 25-26).

exceeding the remaining BLMIS funds by over \$400 million, and thus removing any
potential BLMIS property:

Recipient	Amount Received 4/13/2006 - 7/17/2007	Source	Ex., Page
ABN AMRO Defendants	(\$4,646,883)	12-01697 ECF 1-3	10(gggg), at 208
ABN Switzerland	(481,815)	11-02760 ECF 1-3	10(ff), at 74
Credit Agricole Suisse	(8,845,984)	12-01022 ECF 1-10	10(uu), at 113
Banca Del Gottardo	(2,455,727)	12-01209 ECF 1-4	10(fff), at 139
Banco Itau	(12,176,061)	12-01019 ECF 1-6	10(ss), at 105
Bank Vontobel	(2,385,809)	12-01202 ECF 1-9	10(bbb), at 129
Banque SYZ	(15,449,241)	11-02149 ECF 1-11	10(g), at 21
Barclays Spain	(1,263,660)	11-02569 ECF 1-4	10(t), at 48
Barclays Suisse	(3,642,625)	11-02569 ECF 1-7	10(u), at 50
Barfield Defendants	(2,772,024)	12-01669 ECF 1-9	10(ttt), at 171
BBH	(4,562,526)	12-01670 ECF 1-9	10(uuu), at 173
BCV	(9,769,927)	12-01694 ECF 1-3	10(eeee), at 204
BD Lux	(1,091,380)	12-01691 ECF 1-4	10(cccc), at 198
BG Valores	(897,569)	12-01048 ECF 1-3	10(yy), at 123
BJB	(3,149,748)	11-02922 ECF 1-3	10(ll), at 87-88
BNP Paribas	(593,641)	12-01576 ECF 1-3	10(qqq), at 165
Bordier	(1,480,545)	12-01695 ECF 1-3	10(ffff), at 206
BPES	(3,957,632)	11-02571 ECF 1-4	10(x), at 57
BSI	(5,700,199)	12-01209 ECF 1-3	10(eee), at 135-36
Cathay Bank	(5,404,684)	11-02568 ECF 1-5	10(s), at 46
Citivic	(2,760,954)	12-01513 ECF 1-3	10(nnn), at 156

Recipient	Amount Received 4/13/2006 - 7/17/2007	Source	Ex., Page
Clariden/Bank Leu	(12,749,058)	12-01676 ECF 1-5	10(www), at 178-79
Credit Suisse (Luxembourg) SA	(5,345,147)	11-02925 ECF 1-5	10(nn), at 93
Credit Suisse AG	(913,295)	11-02925 ECF 1-5	10(nn), at 93-94
Credit Suisse AG, Nassau Branch	(247,450)	11-02925 ECF 1-5	10(nn), at 93
Credit Suisse London Nominees	(47,516,205)	11-02925 ECF 1-5	10(nn), at 93-94
Credit Suisse Nominees (Guernsey)	(484,526)	11-02925 ECF 1-5	10(nn), at 93-94
Credit Suisse Wealth Management	(1,450,752)	11-02925 ECF 1-5	10(nn), at 93-94
Delta Bank	(601,809)	11-02551 ECF 1-4	10(o), at 37
Dexia Banque	(39,846,392)	12-01698 ECF 1-5	10(hhhh), at 210
Dexia Banque Suisse	(70,169)	12-01698 ECF 1-5	10(hhhh), at 210
EFG Bank	(39,007,181)	12-01690 ECF 1-7	10(aaaa), at 191-93
Guernroy or RBC-CI	(2,243,596)	12-01699 ECF 1-5	10(iiii), at 212
Inteligo	(235,000)	11-02763 ECF 1-4	10(ii), at 80
KEB	(5,290,630)	11-02572 ECF 1-3	10(y), at 60
LGT Liechtenstein	(416,309)	11-02929 ECF 1-3	10(oo), at 97
LGT Switzerland	(140,030)	12-01577 ECF 1-4	10(sss), at 169
Lloyds	(447,096)	12-01207 ECF 1-3	10(ddd), at 133
Lombard Odier	(20,350,132)	12-01693 ECF 1-3	10(dddd), at 201
Merrill Lynch International	(1,200,000)	10-05346 ECF 1-1	10(b), at 6
MLBS	(3,813,482)	11-02910 ECF 1-3	10(kk), at 84-85
Quilvest	(17,993,166)	11-02538 ECF 1-4	10(j), at 27
RBC	(5,324,041)	12-01699 ECF 1-5	10(iiii), at 212
RBC-Asia	(326,756)	12-01699 ECF 1-5	10(iiii), at 212

Recipient	Amount Received 4/13/2006 - 7/17/2007	Source	Ex., Page
RBC-Dexia	(5,146,594)	12-01698 ECF 1-5	10(hhhh), at 210
RBC-Dexia Espana	(32,000)	12-01698 ECF 1-5	10(hhhh), at 210
RBC-Dominion	(391,370)	12-01699 ECF 1-5	10(iiii), at 212
RBC-Suisse	(76,044)	12-01699 ECF 1-5	10(iiii), at 212
Safra New York	(31,864,329)	11-01885 ECF 1-3	10(f), at 16-18
Schroder & Co. Bank AG	(14,870,151)	12-01210 ECF 1-14	10(ggg), at 142
Amit Vijayvergiya	(955,465)	09-01239 ECF 286-21	9, at 27
Fairfield Greenwich (Bermuda) Ltd	(179,676,004)	09-01239 ECF 286-13	9, at 16
Fairfield Greenwich Advisors	(10,459,218)	09-01239 ECF 286-14	9, at 22
Fairfield Greenwich Limited	(5,586)	09-01239 ECF 286-12	9, at 13
Fairfield Investment Fund	(61,565,202)	09-01239 ECF 286-10	9, at 7-8
FIF Advanced Ltd.	(3,165,000)	09-01239 ECF 286-8	9, at 6
Fairfield Lambda	(4,626,206)	09-01239 ECF 286-6	9, at 4
Fairfield Sigma	(37,566,670)	09-01239 ECF 286-5	9, at 2-3
SG Lugano	(95,996)	12-01677 ECF 1-5	10(xxx), at 182
SG Suisse	(3,643,050)	12-01677 ECF 1-5	10(xxx), at 182
SGBT	(237,116)	12-01677 ECF 1-5	10(xxx), at 182
SGBT Lux/OFI	(6,026,761)	12-01677 ECF 1-5	10(xxx), at 182
SGBT Lux/UMR	(7,113,675)	12-01677 ECF 1-5	10(xxx), at 182
Sico	(6,749,295)	12-01005 ECF 1-6	10(rr), at 103
SNS Defendants	(5,917,907)	12-01046 ECF 1-3	10(ww), at 118- 119
The Standard Chartered Defendants	(19,680,102)	12-01565 ECF 1-6	10(ooo), at 158- 159
Trincaster	(2,000,000)	11-02731 ECF 1-3	10(bb), at 66
UKFP	(39,233)	12-01566 ECF 1-2	10(ppp), at 163
Unifortune	(11,729)	11-02553 ECF 1-3	10(p), at 40

Recipient	Amount Received 4/13/2006 - 7/17/2007	Source	Ex., Page
Union Global A Fund	(2,049,099)	12-01211 ECF 1-4	10(iii), at 146
Union Global Fund	(3,033,828)	12-01211 ECF 1-3	10(hhh), at 144
Union Strategy Fund	(321,757)	12-01211 ECF 1-5	10(jjj), at 148
ZCM	(9,302,755)	12-01512 ECF 1-6	10(mmm), at 154
Total	(\$716,122,998)		

- u. On July 19, 2007, Sentry allegedly transferred \$5 million to Grosvenor Defendants (Compl. Ex. E). By that date, Sentry had distributed approximately \$400 million more than BLMIS put in since the last BLMIS transfer on April 13, 2006.
- v. Taking into account the Trustee's allegations described above, Sentry possessed no BLMIS funds when \$19,691,288 of the \$31,506,389 alleged subsequent transfers from Sentry to the Grosvenor Defendants were made.
- w. The Trustee asserts that, in total, Sentry received approximately **\$3 billion** of recoverable BLMIS funds (Compl. ¶ 38). At the same time, the Trustee alleges Sentry subsequently transferred approximately **\$5 billion** in customer property following the first recoverable BLMIS transfer on May 9, 2003. Therefore, the Trustee seeks to recover **\$2 billion more** in subsequent transfers than were initially transferred into Sentry:

Recipient	Source	Amount	Ex., Page
Citibank, N.A., et al	10-05345 ECF 1-1 [p. 52]	(\$130,000,000)	10(a), at 1
Merrill Lynch International	10-05346 ECF 1-1 [p. 43]	(14,200,000)	10(b), at 4
Nomura International PLC	10-05348 ECF 42-4	(20,013,186)	10(c), at 7
Banco Bilbao Vizcaya Argentaria, S.A.	10-05351 ECF 1-1	(45,000,000)	10(d), at 9
Pictet et Cie.	11-01724 ECF 1 [p. 24]	(50,386,685)	10(e), at 12

Recipient	Source	Amount	Ex., Page
Safra New York	11-01885 ECF 1-3	(95,853,575)	10(f), at 15
Banque Syz & Co., S.A.	11-02149 ECF 1-11	(15,449,241)	10(g), at 20
ADIA	11-02493 ECF 1-5	(300,000,000)	10(h), at 22
Orbita	11-02537 ECF 1-3	(30,662,226)	10(i), at 24
Quilvest	11-02538 ECF 1-4	(37,800,115)	10(j), at 26
Meritz Fire & Marine Insurance Co. Ltd.	11-02539 ECF 1-3	(21,855,898)	10(k), at 28
LGI	11-02540 ECF 1-4	(50,583,443)	10(l), at 30
First Gulf Bank	11-02541 ECF 1-4	(11,532,393)	10(l), at 32
Parson Finance Panama S.A.	11-02542 ECF 1-3	(11,089,081)	10(m), at 34
Delta Bank	11-02551 ECF 1-4	(20,634,958)	10(o), at 36
Unifortune	11-02553 ECF 1-3	(16,355,651)	10(p), at 39
National Bank of Kuwait S.A.K.	11-02554 ECF 1-4	(18,724,399)	10(q), at 41
Cathay Insurance	11-02568 ECF 1-4	(24,496,799)	10(r), at 43
Cathay Bank	11-02568 ECF 1-5	(17,206,126)	10(s), at 45
Barclays Private Bank	11-02569 ECF 1-9	(893,988)	10(v), at 52
Barclays Spain	11-02569 ECF 1-4	(4,719,252)	10(t), at 47
Barclays Suisse	11-02569 ECF 1-7	(37,973,175)	10(u), at 49
Banca Carige S.P.A.	11-02570 ECF 1-3	(10,532,489)	10(w), at 54
BPES	11-02571 ECF 1-4	(11,426,745)	10(x), at 56
KEB	11-02572 ECF 1-3	(33,593,108)	10(y), at 59
The Sumitomo Trust and Banking Co., Ltd.	11-02573 ECF 8-4	(54,253,642)	10(z), at 61
ASB	11-02730 ECF 1-4	(120,168,691)	10(aa), at 63
Trincaster Corporation	11-02731 ECF 1-3	(13,311,800)	10(bb), at 65
Bureau of Labor Insurance	11-02732 ECF 1-3	(42,123,406)	10(cc), at 67
Naidot	11-02733 ECF 1-3	(13,654,907)	10(dd), at 69
Caceis Bank, Caceis Bank Luxembourg	11-02758 ECF 1-4	(24,052,229)	10(ee), at 71
ABN Switzerland	11-02760 ECF 1-3	(2,808,105)	10(ff), at 73
Lighthouse Diversified	11-02762 ECF 1-4	(7,913,873)	10(gg), at 75
Lighthouse Supercash	11-02762 ECF 1-5	(3,251,378)	10(hh), at 77
Inteligo	11-02763 ECF 1-4	(10,745,161)	10(ii), at 79
Somers Dublin	11-02784 ECF 1-3	(1,985,648)	10(jj), at 81
MLBS	11-02910 ECF 1-3	(44,127,785)	10(kk), at 83
BJB	11-02922 ECF 1-3	(35,258,614)	10(ll), at 86
Falcon	11-02923 ECF 1-3	(38,675,129)	10(mm), at 89
CS Sentry Transferees	11-02925 ECF 1-5	(256,629,645)	10(nn), at 91

Recipient	Source	Amount	Ex., Page
LGT Liechtenstein	11-02929 ECF 1-3	(10,350,118)	10(oo), at 96
PIFSS	12-01002 ECF 1-3	(30,000,000)	10(pp), at 98
Fullerton	12-01004 ECF 1-3	(10,290,445)	10(qq), at 100
SICO	12-01005 ECF 1-6	(14,544,621)	10(rr), at 102
Banco Itau	12-01019 ECF 1-6	(60,595,069)	10(ss), at 104
Banco Itau International	12-01019 ECF 1-7	(9,969,942)	10(tt), at 109
Grosvenor Aggressive	12-01021 ECF 1-3	(4,191,288)	1, at 97
Grosvenor Balanced	12-01021 ECF 1-4	(13,000,000)	1, at 98
Grosvenor Reserve	12-01021 ECF 1-5	(14,315,101)	1, at 99
Credit Agricole Suisse	12-01022 ECF 1-10	(15,654,127)	10(uu), at 112
Arden Management	12-01023 ECF 1-3	(12,586,659)	10(vv), at 115
SNS Defendants	12-01046 ECF 1-3	(21,060,551)	10(ww), at 117
Koch Investment	12-01047 ECF 1-3	(21,533,871)	10(xx), at 120
BG Valores	12-01048 ECF 1-3	(8,240,499)	10(yy), at 122
Kookmin Bank	12-01194 ECF 1-3	(42,010,303)	10(zz), at 124
Six Sis AG	12-01195 ECF 1-3	(379,248)	10(aaa), at 126
Bank Vontobel	12-01202 ECF 1-9	(8,470,371)	10(bbb), at 128
Multi-Strategy Fund	12-01205 ECF 1-6	(25,763,374)	10(ccc), at 130
Lloyds	12-01207 ECF 1-3	(11,134,574)	10(ddd), at 132
BSI	12-01209 ECF 1-3	(27,452,138)	10(eee), at 134
Banca del Gottardo	12-01209 ECF 1-4	(20,058,735)	10(fff), at 138
Schroder & Co. Bank AG	12-01210 ECF 1-14	(25,143,816)	10(ggg), at 141
Union Global A Fund	12-01211 ECF 1-4	(6,477,447)	10(hhh), at 145
Union Global Fund	12-01211 ECF 1-3	(9,283,664)	10(ddd), at 143
Union Strategy Fund	12-01211 ECF 1-5	(1,445,016)	10(jjj), at 147
Hapoalim Switzerland	12-01216 ECF 1-6	(20,047,109)	10(kkk), at 149
Hapoalim B.M.	12-01216 ECF 1-7	(1,712,100)	10(lll), at 151
ZCM	12-01512 ECF 1-6	(24,491,791)	10(mmm), at 153
Citivic	12-01513 ECF 1-3	(59,479,232)	10(nnn), at 155
Standard Chartered Defendants	12-01565 ECF 1-6	(275,267,978)	10(ooo), at 157
UKFP	12-01566 ECF 1-2	(8,012,183)	10(ppp), at 162
BNP Paribas	12-01576 ECF 1-3	(3,423,188)	10(qqq), at 164
UBS Deutschland	12-01577 ECF 1-3	(7,230,511)	10(rrr), at 166
LGT Switzerland	12-01577 ECF 1-4	(522,826)	10(sss), at 168
Barfield Defendants	12-01669 ECF 1-9	(16,178,329)	10(ttt), at 170
BBH	12-01670 ECF 1-9	(26,121,583)	10(uuu), at 172
Credit Agricole Miami	12-01670 ECF 1-10	(6,741,013)	10(vvv), at 175
Clariden/Bank Leu	12-01676 ECF 1-5	(35,838,401)	10(www), at 177
SG Sentry Defendants	12-01677 ECF 1-5	(128,678,138)	10(xxx), at 181
Low Volatility	12-01680 ECF 1-3	(7,913,079)	10(yyy), at 184

Recipient	Source	Amount	Ex., Page
Medium Volatility	12-01680 ECF 1-4	(3,740,436)	10(zzz), at 186
EFG Bank	12-01690 ECF 1-7	(201,594,824)	10(aaaa), at 188
BD Lux	12-01691 ECF 1-4	(1,303,203)	10(cccc), at 197
Degroof	12-01691 ECF 1-3	(58,473)	10(bbbb), at 195
Lombard Odier	12-01693 ECF 1-3	(95,595,385)	10(dddd), at 199
BCV	12-01694 ECF 1-3	(9,769,927)	10(eeee), at 203
Bordier	12-01695 ECF 1-3	(7,928,454)	10(ffff), at 205
ABN AMRO Defendants.	12-01697 ECF 1-3	(122,001,935)	10(gggg), at 207
Dexia Fairfield Sentry Defendants	12-01698 ECF 1-5	(61,515,524)	10(hhhh), at 209
RBC Fairfield Sentry Defendants	12-01699 ECF 1-5	(38,182,649)	10(iiii), at 211
Fairfield Sigma	09-01239 ECF 23-1 Ex. 8; ECF 286-5	(788,690,257)	8, at 8-12; 9, at 3
Fairfield Lambda	09-01239 ECF 23-1 Ex. 9; ECF 286-6	(55,041,017)	8, at 14-18; 9, at 5
Fairfield Investment Trust	09-01239 ECF 23-1 Exs. 16, 17	(4,245,788)	8, at 20-29
FIF Advanced Ltd.	09-01239 ECF 286-8	(45,206,428)	9, at 6
Fairfield Investment Fund Limited	09-01239 ECF 286-10	(337,718,887)	9, at 8
Fairfield Greenwich Limited	09-01239 ECF 286-12	(87,440,586)	9, at 13
Fairfield Greenwich (Bermuda) Limited	09-01239 ECF 286-13	(611,613,040)	9, at 17
Fairfield Greenwich Advisors	09-01239 ECF 286-14	(56,013,598)	9, at 22
Amit Vijayvergiya	09-01239 ECF 286-21	(955,465)	9, at 27
Total Sentry Six-Year Transfers		(\$5,274,166,860)	
Less Pre-May 9, 2003 transfers		\$180,682,504	
Total Sentry Six-Year Transfers After First Potentially Avoidable Sentry Initial Transfer (May 9, 2003)		(\$5,093,484,356)	

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I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 15, 2022
New York, NY

By: /s/ Ehud Barak
Ehud Barak